

IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

\*

UNITED STATES OF AMERICA

\*

v.

No. 07-4059 (L)

\*

PAULETTE MARTIN, et al.

\*

\* \* \* \* \*

**JOINT MOTION TO EXTEND TIME FOR FILING FINAL BRIEFS**

Comes now Appellant herein, Paulette Martin, by and through her counsel, Michael D. Montemarano, Esq., and Michael D. Montemarano, P.A., as appointed counsel pursuant to the CJA, and as lead appellate counsel for the five other Appellants herein, and on behalf of Daniel Goodman, Esq., United States Department of Justice, counsel for Appellee, and does move for the extension of the time for the briefing of this matter, and in support thereof does state:

1. The final version of the initial Briefs of the parties, along with the Reply Brief of Appellants all are due on March 7, 2011, per the current briefing order, under Rule 30(c). The oversized Joint Appendix has been filed prior to this date.
2. Due to other ongoing professional considerations on the part of counsel for the several parties, it is both realized and agreed that a small amount of additional time will be required for the finalization of the briefs. For example, undesigned lead counsel was scheduled to be in trial over this week and last in United District Court in Baltimore, and only was released from this commitment immediately prior to jury selection. Other counsel have similar conflicts. Counsel for Appellant Dobie is involved in preparation of a brief to the United States Supreme Court, and counsel for Appellee is preparing for an upcoming argument before the United States Court of

Appeals for the Ninth Circuit, which necessarily also will involve travel.

4. In addition, the Supplemental Joint Appendix, which is the subject of a separate motion filed contemporaneously herewith, cannot be completed by the printer until Tuesday, March 8, as the needed materials were not available before that date, meaning that the briefs cannot be finalized before that date.

4. Accordingly, the parties jointly request that the briefing schedule be revised as follows: the initial Briefs of the parties will be due on March 9, and the Reply Brief of Appellants will be due on March 16, 2011.

Respectfully submitted,

March 7, 2011

/s/  
MICHAEL D. MONTEMARANO

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Counsel of Record/CJA Counsel  
For Appellant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on or before this 7<sup>th</sup> day of March, 2011, a copy of the foregoing *Motion to Extend Time for Filing Final Briefs* was filed via CM-ECF, and served via direct email, on Daniel Greenberg, Esq., US Department of Justice, Criminal Appellate Section, 1264 Main Building, 950 Pennsylvania Avenue, NW, Washington, DC 20530.

/s/  
MICHAEL D. MONTEMARANO